

**Brian N. Lathen, OSB No. 043374**

[blathen@slamlaw.com](mailto:blathen@slamlaw.com)

3040 Commercial Street S.E.

Suite 200

Salem, OR 97302

Telephone: (503)581-2421

Facsimile: (503)588-7179

*Attorney for Plaintiff Mark A. Meleason, P/R  
Of the Estate of Marganne M. Allen, Dec'd.*

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF OREGON

**MARK A. MELEASON** Personal  
Representative of the Estate of  
**MARGANNE M. ALLEN**, Deceased.

Case No.: 6:25-cv-00232-MTK

Plaintiff,

PLAINTIFF'S UNOPPOSED  
MOTION TO FILE AMENDED  
COMPLAINT

v.

**UNITED STATES OF AMERICA,  
SALEM POLICE DEPARTMENT,  
and CITY OF SALEM**

Defendants.

**CERTIFICATE OF COMPLIANCE WITH LR 7-1**

Pursuant to Local Rule 7-1(a)(1)(A), Counsel for Defendants United States, Drug  
Enforcement Administration, Samuel Landis and Salem Police Department and the City of

Page | 1 Plaintiff's Motion to File Amended Claim for Relief

Swanson, Lathen, Prestwich, P.C.  
3040 Commercial St. SE Suite 200, Salem, OR 97302  
(503)581.2421

Salem have conferred. Defendants do not oppose Plaintiff's Motion to File the Amended Complaint.

### **MOTION**

Plaintiff, by and through their attorney, Brian N. Lathen, moves this Court for an order allowing Plaintiff's unopposed Motion to File their Amended Complaint.

The amendment is necessary to clarify and correct allegations in the initial Complaint filed with this court on February 12, 2025.

Pursuant to LR 15-1(b), attached as an exhibit is a copy of the proposed First Amended Complaint which shows how the proposed Amended Complaint differs from the initial Complaint filed on February 12, 2025.

### **MEMORANDUM**

Plaintiff filed this action on February 12, 2025, for personal injury and wrongful death. Pursuant to Fed. R. Civ. P. 15 a party may amend a pleading "by leave of court or by written consent of the adverse party; and leave shall be freely given when justice so requires."

Defendant United States of America does not object to the amendment. Defendants City of Salem and Salem Police Department have not objected to date. The amended complaint will streamline any motions practice. The motion is made in good faith and not for purpose delay.

### **CONCLUSION**

For the foregoing reasons, Plaintiff respectfully requests that this Court grant the Motion

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to file the First Amended Complaint.

Respectfully submitted this 6<sup>th</sup> day of May, 2025.

SWANSON, LATHEN, PRESTWICH, P.C.

By: /s/Brian N. Lathen  
Brian N. Lathen, OSB #043374  
Attorney for Plaintiff  
e-mail: [blathen@slamlaw.com](mailto:blathen@slamlaw.com)  
FAX: 503.588.7179